

## The Bellantoni Law Firm, PLLC

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March 13, 2019

**VIA ECF**

Hon. Cathy Seibel  
United States District Court Judge  
300 Quarropas Street  
White Plains, New York 10601

Re: Bovell v. City of Mount Vernon, et al. 15 Civ. 8594 (CS)

Dear Judge Seibel,

I write briefly in response to today's letter to the Court from Murashea Bovell to clarify his description of my "very uncooperative and resistant" position toward providing him with the file maintained by my office in the above matter.

As I have advised Mr. Bovell, and another attorney that he retained a few months ago, there is a retaining/possessory lien on the file for the cost of deposition and trial transcripts in this matter.

Mr. Bovell has not paid his bill. I have attached the invoice that was sent to Mr. Bovell, which reflects a balance in the amount of \$3,215.29 for out-of-pocket expenses for which Mr. Bovell is responsible.

I also advised Mr. Bovell's attorney to direct his client to stop contacting me (and then so advised Mr. Bovell directly when he would not stop contacting me), because he had an attorney for that purpose.

Mr. Bovell's failure to grasp the concept of personal responsibility in the context of his unwillingness to pay his bill has led to my "resistance" in releasing my file to him.

Thank you for the Court's time and consideration.

Sincerely,

/s  
Amy L. Bellantoni

# CLIENT STATEMENT

INVOICE NUMBER: 60  
INVOICE DATE: MAY 25, 2018

DUE DATE: JUNE 25, 2018  
PAYMENT TERMS: DUE WITHIN 30 DAYS

FROM: The Bellantoni Law Firm, PLLC  
2127 Crompond Road (Billing address)  
Suite 201  
Cortlandt Manor, NY 10567

TO: Mike Bovell

DATE	PROJECT	DESCRIPTION	QTY	RATE	AMOUNT
NOV-04-16	Mount Vernon Federal Case	PROJECT: Mount Vernon Federal Case Deposition of Michael Goldman.	1.00	\$1,205.70	\$1,205.70
NOV-15-16	Mount Vernon Federal Case	Deposition of Paul Nawrocki.	1.00	\$1,583.35	\$1,583.35
APR-06-18	Mount Vernon Federal Case	Transcript of Court Trial testimony.  TOTAL: Mount Vernon Federal Case Total hours for this statement	1.00 0.00	\$426.24	\$426.24 \$3,215.29
		Total amount of this statement			\$3,215.29

ACCOUNT INFORMATION	
Prior account balance as of APR-04-2016	\$641.00
Payment APR-28-2016 - Check	(\$641.00)
Payment JAN-31-2018 - Check 431	(\$250.00)
Invoice 59 MAY-25-2018	\$3,703.90
Invoice 60 MAY-25-2018	\$3,215.29
Current account balance	\$6,669.19

AMOUNT DUE: \$6,669.19
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